

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY) MDL No. 02419
LITIGATION) Docket No. 1:13-md-2419-RWZ
_____))
))
This document relates to:))
))
All Cases against the Box Hill Defendants¹))
))

DEPOSITION NOTICE

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426), the Defendants Box Hill Surgery Center, LLC, Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., LLC (collectively, "Box Hill Defendants"), will take the deposition of Shmuel Shoham, M.D. on Thursday, January 19, 2017 at 10:00 a.m., located at the Law Offices of Peter G. Angelos, P.C., One Charles Center, 100 N. Charles Street, Baltimore, Maryland 21201. The deposition will be recorded by stenographical means. A request for records is attached as Exhibit A hereto.

Respectfully submitted,

/s/ Gregory K. Kirby

Gregory K. Kirby
Pessin Katz Law, P.A.
901 Dulaney Valley Road, Suite 500
Towson, Maryland 21204
gkirby@pklaw.com
(410) 938-8800
*Attorneys for Box Hill Surgery Center, L.L.C., Ritu
T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D.,
L.L.C.*

This pleading applies to the following cases: Handy v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14019-RWZ; Armetta v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14022-RWZ; Torbeck v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14023-RWZ; Kashi v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14026-RWZ; Bowman v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14028-RWZ; Dreisch v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14029-RWZ; Davis v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14033-RWZ; Farthing v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14036-RWZ.

CERTIFICATE OF SERVICE

I, Gregory K. Kirby, hereby certify that a copy of the foregoing document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF), including the attorneys representing the plaintiffs in the individual cases, and will be sent to these parties by operation of the CM/ECF system, as well as sent to the deponents as identified in each Notice of Deposition.

Dated: December 14, 2016

/s/ Gregory K. Kirby

EXHIBIT A

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, expert witness Shmuel Shoham, M.D. (“You” or “Dr. Shoham”), to produce the following documents at least seven days prior to his deposition:

1. All documents containing facts or data that You considered in forming Your expert opinions.
2. All documents containing facts or data that the underlying party’s attorney provided to You and that You considered in forming the opinions to be expressed.
3. Copies of all scholarly literature on which You relied.
4. All exhibits that You intend to use to summarize or support his opinions.
5. All materials relevant to Your opinions and Your expert report in this case.
6. A list of all publications You authored in the previous 10 years.
7. A list of all other cases in which You have testified as an expert at trial or by deposition within the previous 4 years.
8. All communications and documents relating to compensation for Your study, report, and/or testimony.
9. All non-privileged communications relating to Your report.
10. Your current resume and curriculum vitae.

